

# EXHIBIT A



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**Case No. VENEZUELA-EO13850-2022-954785-1**

Andres Gamardo  
Casa Express Corp  
c/o Gamardo, P.A.  
1200 Brickell Avenue, Suite 750  
Miami, FL 33131

Dear Mr. Gamardo:

This is in response to your request dated July 22, 2022, to the Office of Foreign Assets Control (OFAC) (the "Application") on behalf of Casa Express Corp (the "Applicant"), requesting authorization to litigate in the case styled *Casa Express Corp v. Bolivarian Republic of Venezuela, et al.*, Case No. 1:21-23103-BB, which you indicate in the Application is pending in the U.S. District Court for the Southern District of Florida. In the Application, you appear to indicate that the current litigation is in regard to seeking execution against certain blocked real properties held by Raul Gorrin Belisario in partial satisfaction of a judgment that the Applicant has obtained against the Bolivarian Republic of Venezuela. You state in the Application that, if Casa Express prevails in court, it will submit a new application for a specific license seeking authorization to execute that judgment with respect to certain blocked properties.

As you know, Executive Order 13808 of August 24, 2017, "Imposing Additional Sanctions With Respect to the Situation in Venezuela" ("E.O. 13808") prohibits, among other things, all transactions related to, provision of financing for, and other dealings by a United States person or within the United States in, certain new debt of the Government of Venezuela (GOV) and bonds issued by the GOV prior to the effective date of E.O. 13808. In addition, Executive Order 13850 of November 1, 2018, "Blocking Property of Additional Persons Contributing to the Situation in Venezuela" ("E.O. 13850"), generally prohibits transactions and dealings in property and interests in property of individuals and entities designated pursuant to E.O. 13850. On August 5, 2019, the President issued Executive Order 13884 (E.O. 13884), "Blocking Property of the Government of Venezuela," which generally prohibits U.S. persons from engaging in transactions involving the Government of Venezuela (GOV) and blocks all property and interests in property of the GOV that are in the United States, that come within the United States, or that are or come within the possession or control of any United States person.

Based on the information provided in the Application, the proposed activities would not be prohibited by E.O. 13808. In addition, we understand based on the Application that the proposed litigation activities would not be on behalf of persons who are identified on OFAC's Specially Designated Nationals and Blocked Persons (SDN) List, or otherwise blocked persons. To the extent this is accurate, and to the extent the transactions do not involve persons blocked consistent with OFAC's 50 percent rule guidance of § 591.406 of the Venezuela Sanctions Regulations, 31 C.F.R. part 591 (the "VSR"), based on the information provided to OFAC, the proposed activities would also not appear to be prohibited by E.O. 13850 or E.O. 13884. Therefore, based solely on

the limited information provided in the Application, the applicant's proposed activities do not appear to require a license from OFAC.

Please note, however, that the entry into a settlement agreement or the enforcement of any lien, judgment, arbitral award, decree, or other order through execution, garnishment, or other judicial process purporting to transfer or otherwise alter or affect property or interests in property blocked pursuant to the VSR is prohibited unless authorized pursuant to a specific license issued by OFAC pursuant to the VSR. *See* VSR § 591.407. This includes the purported creation or perfection of any legal or equitable interests (including contingent or inchoate interests) in blocked property. *See* FAQ 808. We encourage you to submit a license application or interpretive guidance request to OFAC, as appropriate, if and when the judicial process reaches that point.

If you have any additional questions, you may refer to our web site at [www.treasury.gov/ofac](http://www.treasury.gov/ofac) or call our office at (202) 622-2480.

Sincerely,

Mary Patricia Rasmussen, Digitally signed by Mary Patricia Rasmussen, Deputy Assistant Director  
Date: 2023.11.09 11:12:25 -05'00'  
Deputy Assistant Director

November 9, 2023

Mary P. Rasmussen  
Deputy Assistant Director for Licensing  
Office of Foreign Assets Control

Date